

EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

HANANE CHEDDADI SAFI,

Plaintiff,

v.

CENTRAL MARKET - HEB,

Defendant.

§
§
§
§
§
§
§
§
§

CIVIL ACTION NO.

INDEX TO DEFENDANT'S NOTICE OF REMOVAL

EXHIBIT	DOCUMENT	DATE OF DOCUMENT AND/OR FILING
A-1	State Court Action Docket Sheet	04/19/2021
A-2	Case Filing Cover Sheet and Plaintiff's Original Position	11/09/2020
A-3	Return of Service	03/15/2021
A-4	Return of Service	03/23/2021
A-5	Defendant's Original Answer	04/09/2021

46781937.1

EXHIBIT A-1

Case Information

DC-20-16679 | HANANE CEDDADI SAF vs. CENTRAL MARKET- HEB

Case Number

DC-20-16679

File Date

11/09/2020

Court

95th District Court

Case Type

EMPLOYMENT

Judicial Officer

PURDY, MONICA

Case Status

OPEN

Party

PLAINTIFF

SAF, HANANE CEDDADI

Address

7344 HIGHLAND HEATHER LN

DALLAS TX 75248

Active Attorneys ▼

Pro Se

DEFENDANT

CENTRAL MARKET- HEB

Address

646 SOUTH FLOREST

SAN ANTONIO TX 78204

Active Attorneys ▼

Lead Attorney

BAKER, JANA S

Retained

Events and Hearings

11/09/2020 NEW CASE FILED (OCA) - CIVIL

11/09/2020 ORIGINAL PETITION

11/09/2020 AFFIDAVIT INABILITY TO PAY

11/09/2020 CASE FILING COVER SHEET ▼

CASE FILING COVER SHEET

11/09/2020 ISSUE CITATION ▼

CENTRAL MARKET - HEB - PCT. 3

11/10/2020 CITATION ▼

Return Unserved

12/18/2020

Anticipated Server

CONSTABLE 3

Anticipated Method

Actual Server

CONSTABLE 3

Returned

12/18/2020

Comment

CENTRAL MARKET - HEB

12/21/2020 RETURN OF SERVICE ▼

UNEXECUTED CITATION - CENTRAL MARKET - HEB

Comment

UNEXECUTED CITATION - CENTRAL MARKET - HEB

02/02/2021 NOTE - ADMINISTRATOR ▼

dwop hearing notice

Comment

Set for Dismissal. E-mailed Pro Se.

03/08/2021 ISSUE CITATION ▼

CENTRAL MARKET - HEB - PCT. 3
<div>03/09/2021 NOTE - ADMINISTRATOR ▼</div> <div>dwop hearing notice</div> <div>Comment</div> <div>Dismissal re-set. E-mailed plaintiff.</div>
<div>03/09/2021 CITATION ▼</div> <div>Served</div> <div>03/11/2021</div> <div>Anticipated Server</div> <div>CONSTABLE 3</div> <div>Anticipated Method</div> <div>Actual Server</div> <div>CONSTABLE 3</div> <div>Returned</div> <div>03/15/2021</div> <div>Comment</div> <div>CENTRAL MARKET-HEB</div>
<div>03/10/2021 ISSUE CITATION ▼</div> <div>CENTRAL MARKET-HEB - CERT MAIL</div> <div>Comment</div> <div>CERT MAIL - 9214 8901 0661 5400 0160 7844 95</div>
<div>03/15/2021 RETURN OF SERVICE ▼</div> <div>EXECUTED CITATION - CENTRAL MARKET-HEB</div> <div>Comment</div> <div>EXECUTED CITATION - CENTRAL MARKET-HEB</div>
<div>03/15/2021 CITATION ▼</div> <div>Served</div> <div>03/18/2021</div> <div>Anticipated Server</div> <div>CERTIFIED MAIL</div> <div>Anticipated Method</div> <div>Actual Server</div> <div>CERTIFIED MAIL</div> <div>Returned</div>

03/23/2021 Comment CENTRAL MARKET-HEB	
03/23/2021 RETURN OF SERVICE ▼ EXECUTED - CITATION - CENTRAL MARKET-HEB - CERT MAIL Comment EXECUTED - CITATION - CENTRAL MARKET-HEB - CERT MAIL	
04/07/2021 NOTE - ADMINISTRATOR ▼ dwop hearing notice Comment Dismissal re-set. E-mailed plaintiff.	
04/09/2021 ORIGINAL ANSWER - GENERAL DENIAL ▼ ORIGINAL ANSWER - CENTRAL MARKET - HEB	
04/13/2021 NOTE - ADMINISTRATOR ▼ Comment Dismissal hearing canceled. Answer filed.	
04/29/2021 DISMISSAL FOR WANT OF PROSECUTION ▼ dwop hearing notice Judicial Officer PURDY, MONICA Hearing Time 9:00 AM Cancel Reason BY COURT ADMINISTRATOR Comment Notes from 3/4 docket sheet: Def. not able to receive notice. Re-set 30.	

Financial

SAF, HANANE CEDDADI

Total Financial Assessment		\$552.00
Total Payments and Credits		\$88.00
11/9/2020	Transaction Assessment	\$292.00
11/9/2020	Transaction Assessment	\$88.00
3/8/2021	Transaction Assessment	\$88.00
3/8/2021	PAYMENT (CASE FEES)	Receipt # 13704-2021-DCLK
		SAF, HANANE CEDDADI (\$88.00)
3/10/2021	Transaction Assessment	\$84.00

Documents

CASE FILING COVER SHEET
 CENTRAL MARKET - HEB - PCT. 3
 UNEXECUTED CITATION - CENTRAL MARKET - HEB
 dwop hearing notice
 CENTRAL MARKET - HEB - PCT. 3
 dwop hearing notice
 CENTRAL MARKET-HEB - CERT MAIL
 EXECUTED CITATION - CENTRAL MARKET-HEB
 EXECUTED - CITATION - CENTRAL MARKET-HEB - CERT MAIL
 dwop hearing notice
 ORIGINAL ANSWER - CENTRAL MARKET - HEB

EXHIBIT A-2

CIVIL CASE INFORMATION SHEET

Case 3:21-cv-00894-B Document 1-1 Filed 04/29/21 Page 11 of 25 PageID 15

CAUSE NUMBER (FOR CLERK USE ONLY):

DC-20-116679

COURT (FOR CLERK USE ONLY):

D-95th

STYLED

(e.g., John Smith v. All American Insurance Co; In re Mary Ann Jones; In the Matter of the Estate of George Jackson)

A civil case information sheet must be completed and submitted when an original petition or application is filed to initiate a new civil, family law, probate, or mental health case or when a post-judgment petition for modification or motion for enforcement is filed in a family law case. The information should be the best available at the time of filing.

1. Contact information for person completing case information sheet:		Names of parties in case:	Person or entity completing sheet is:
Name: <u>Hanane Cheddadi Safi</u>	Email: <u>cheddadi.hanane@gmail.com</u>	Plaintiff(s)/Petitioner(s): <u>Hanane Cheddadi Safi</u>	<input type="checkbox"/> Attorney for Plaintiff/Petitioner <input type="checkbox"/> Pro Se Plaintiff/Petitioner <input type="checkbox"/> Title IV-D Agent <input checked="" type="checkbox"/> Other: <u>Aliana Mata Deputy</u>
Address: <u>7344 Highland Heather Ln</u>	Telephone: <u>469-347-0794</u>	Defendant(s)/Respondent(s): <u>Central Market H-E-B</u>	Additional Parties in Child Support Case: _____ Custodial Parent: _____ Non-Custodial Parent: _____ Presumed Father: _____
City/State/Zip: <u>Dallas TX 75248</u>	Fax: _____		
Signature: <u>[Signature]</u>	State Bar No: _____		
(Attach additional page as necessary to list all parties)			

2. Indicate case type, or identify the most important issue in the case (select only 1):

Civil		Family Law	
Contract <input type="checkbox"/> Debt/Contract <input type="checkbox"/> Consumer/DTPA <input type="checkbox"/> Debt/Contract <input type="checkbox"/> Fraud/Misrepresentation <input type="checkbox"/> Other Debt/Contract: _____ Foreclosure <input type="checkbox"/> Home Equity—Expedited <input type="checkbox"/> Other Foreclosure <input type="checkbox"/> Franchise <input type="checkbox"/> Insurance <input type="checkbox"/> Landlord/Tenant <input type="checkbox"/> Non-Competition <input type="checkbox"/> Partnership <input type="checkbox"/> Other Contract: _____	Injury or Damage <input type="checkbox"/> Assault/Battery <input type="checkbox"/> Construction <input type="checkbox"/> Defamation Malpractice <input type="checkbox"/> Accounting <input type="checkbox"/> Legal <input type="checkbox"/> Medical <input type="checkbox"/> Other Professional Liability: <input type="checkbox"/> Motor Vehicle Accident <input type="checkbox"/> Premises Product Liability <input type="checkbox"/> Asbestos/Silica <input type="checkbox"/> Other Product Liability List Product: _____ <input type="checkbox"/> Other Injury or Damage: _____	Real Property <input type="checkbox"/> Eminent Domain/Condemnation <input type="checkbox"/> Partition <input type="checkbox"/> Quiet Title <input type="checkbox"/> Trespass to Try Title <input type="checkbox"/> Other Property: _____ Related to Criminal Matters <input type="checkbox"/> Expunction <input type="checkbox"/> Judgment Nisi <input type="checkbox"/> Non-Disclosure <input type="checkbox"/> Seizure/Forfeiture <input type="checkbox"/> Writ of Habeas Corpus—Pre-indictment <input type="checkbox"/> Other: _____	Marriage Relationship <input type="checkbox"/> Annulment <input type="checkbox"/> Declare Marriage Void Divorce <input type="checkbox"/> With Children <input type="checkbox"/> No Children Other Family Law <input type="checkbox"/> Enforce Foreign Judgment <input type="checkbox"/> Habeas Corpus <input type="checkbox"/> Name Change <input type="checkbox"/> Protective Order <input type="checkbox"/> Removal of Disabilities of Minority <input type="checkbox"/> Other: _____
Employment <input checked="" type="checkbox"/> Discrimination <input type="checkbox"/> Retaliation <input type="checkbox"/> Termination <input type="checkbox"/> Workers' Compensation <input type="checkbox"/> Other Employment: _____		Post-judgment Actions (non-Title IV-D) <input type="checkbox"/> Enforcement <input type="checkbox"/> Modification—Custody <input type="checkbox"/> Modification—Other Title IV-D <input type="checkbox"/> Enforcement/Modification <input type="checkbox"/> Paternity <input type="checkbox"/> Reciprocity (UIFSA) <input type="checkbox"/> Support Order Parent-Child Relationship <input type="checkbox"/> Adoption/Adoption with Termination <input type="checkbox"/> Child Protection <input type="checkbox"/> Child Support <input type="checkbox"/> Custody or Visitation <input type="checkbox"/> Gestational Parenting <input type="checkbox"/> Grandparent Access <input type="checkbox"/> Parentage/Paternity <input type="checkbox"/> Termination of Parental Rights <input type="checkbox"/> Other Parent-Child: _____	
Tax <input type="checkbox"/> Tax Appraisal <input type="checkbox"/> Tax Delinquency <input type="checkbox"/> Other Tax: _____		Probate & Mental Health Probate/Wills/Intestate Administration <input type="checkbox"/> Dependent Administration <input type="checkbox"/> Independent Administration <input type="checkbox"/> Other Estate Proceedings <input type="checkbox"/> Guardianship—Adult <input type="checkbox"/> Guardianship—Minor <input type="checkbox"/> Mental Health <input type="checkbox"/> Other: _____	

3. Indicate procedure or remedy, if applicable (may select more than 1):

<input type="checkbox"/> Appeal from Municipal or Justice Court <input type="checkbox"/> Arbitration-related <input type="checkbox"/> Attachment <input type="checkbox"/> Bill of Review <input type="checkbox"/> Certiorari <input type="checkbox"/> Class Action	<input type="checkbox"/> Declaratory Judgment <input type="checkbox"/> Garnishment <input type="checkbox"/> Interpleader <input type="checkbox"/> License <input type="checkbox"/> Mandamus <input type="checkbox"/> Post-judgment	<input type="checkbox"/> Prejudgment Remedy <input type="checkbox"/> Protective Order <input type="checkbox"/> Receiver <input type="checkbox"/> Sequestration <input type="checkbox"/> Temporary Restraining Order/Injunction <input type="checkbox"/> Turnover
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4. Indicate damages sought (do not select if it is a family law case):

<input type="checkbox"/> Less than \$100,000, including damages of any kind, penalties, costs, expenses, pre-judgment interest, and attorney fees <input type="checkbox"/> Less than \$100,000 and non-monetary relief <input type="checkbox"/> Over \$100,000 but not more than \$200,000 <input type="checkbox"/> Over \$200,000 but not more than \$1,000,000 <input type="checkbox"/> Over \$1,000,000
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HE 1CIT/PCT3 ORIGINAL

AMTIS ENCLTY TO PAY

No DC-20-16679

Pro se

D-95th

Hanane Cheddadi Safi

Plaintiff

In the _____ Court of
Dallas County, Texas
Judicial Districts

Central Market- HEB

Defendant

FILED
2020 NOV -9 PM 4:10
FELICIA PITRE
DISTRICT CLERK
DALLAS CO., TEXAS
Alicia Mata-DEPUTY

PLAINTIFS ORIGINAL POSITION

1. DISCOVERY CONTROL PLAN

Level 2 under Texas rule 190

2. PARTIES

- Plaintiff is Hanane Cheddadi Safi. She can be contacted at 7344 Highland Heather Ln, Dallas, TX 75248.
- Defendant is Central Market-HEB. The cooperation can be contacted at 3890 W Northwest Hwy #300, Dallas, TX 75220.

3. VENUE

The venue of the lawsuit is proper in Dallas County under 15.002 A1 and 15.011 of the Texas Civil Practice Code.

4. FACTUAL BACKGROUND

Plaintiff Hanane Cheddadi Safi was employed at central Market HEB since June 2018. She was taking a leadership class and was training for an assistant service manager position as early as . She became pregnant and after her pregnancy, the company started treating her with discrimination and demoted her from the role she used to play before she got pregnant. Plaintiff Hanane Cheddadi Safi has filed a charge of discrimination on the basis of sex (pregnancy) against the defendant Central Market-HEB with the Equal Employment Opportunity Commission (EEOC) on July 19th, 2019.

5. CAUSE OF ACTION

- The Pregnancy Discrimination Act Title 7 of the Civil Rights Act.
- Texas Commission of Human Rights Act.
- Retaliation under Texas Labor code 21

Beginning approximately June 2019, the plaintiff Hanane Cheddadi Safi has been denied twice the opportunity to promote into the Assistant Service Manager position because of her pregnancy. On or about July 9, 2019, she was also demoted from Assistant Service Manager in Training position to Cashier. Ms. Deidra Mayberry, Service Manager for the defendant Central Market HEB told her that she needed to focus on her pregnancy and not to worry about the Assistant Service Manager position.

Plaintiff Hanane Cheddadi Safi believes that she was discriminated against because of her sex-female (pregnancy), in violation of Title VII of the Civil Rights Act of 1964, as amended.

6. DEMAND

Plaintiff Hanane Cheddadi Safi requests a bench trial.

7. DAMAGES

Plaintiff Hanane Cheddadi Safi is asking for monetary damages and legal fees.

8. ADMINISTRATIVE EXHAUSTION

Plaintiff Hanane Cheddadi Safi filled a discrimination charge against defendant Central Market- HEB on July 19th, 2019 and obtained the notice of suit rights from the (EEOC) on August, 12th 2020.



Hanane Cheddadi Safi
7344 Highland Heather Ln
Dallas TX 75248

469-347-0794
cheddadi.hanane@gmail.com

EXHIBIT A-3

002178

**FORM NO. 353-3 - CITATION
THE STATE OF TEXAS**

To: **CENTRAL MARKET- HEB**
4349 W NORTHWEST HWY
DALLAS TX 75220

midway

GREETINGS:

You have been sued. You may employ an attorney. If you or your attorney do not file a written Answer with the clerk who issued this citation by 10 o'clock a.m. of the Monday next following the expiration of twenty days after you were served this citation and **petition**, a default judgment may be taken against you. In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org. Your answer should be addressed to the clerk of the **95th District Court** at 600 Commerce Street, Ste. 101, Dallas, Texas 75202.

Said Plaintiff being **HANANE CEDDADI SAF**

Filed in said Court **9th day of November, 2020** against

CENTRAL MARKET- HEB

For Suit, said suit being numbered **DC-20-16679**, the nature of which demand is as follows:
Suit on **EMPLOYMENT** etc. as shown on said petition, a copy of which accompanies this citation. If this citation is not served, it shall be returned unexecuted.

WITNESS: FELICIA PITRE, Clerk of the District Courts of Dallas, County Texas.
Given under my hand and the Seal of said Court at office this 9th day of March, 2021.

ATTEST: FELICIA PITRE, Clerk of the District Courts of Dallas, County, Texas

By *Carlenia Bouligny*
CARLENIA BOULIGNY



PCT. 3

CITATION

DC-20-16679

HANANE CEDDADI SAF
Vs.
CENTRAL MARKET- HEB

ISSUED THIS
9th day of March, 2021

FELICIA PITRE
Clerk District Courts,
Dallas County, Texas

By: **CARLENIA BOULIGNY, Deputy**

Attorney for Plaintiff PRO SE
HANANE CEDDADI SAF
7344 HIGHLAND HEATHER LN
DALLAS TX 75248

cheddadi.hanane@gmail.com

AFFIDAVIT INABILITY TO PAY

OFFICER'S RETURN

Case No. : DC-20-16679
Court No. 95th District Court
Style: HANANE CEDDADI SAF
Vs.
CENTRAL MARKET- HEB

Came to hand on the 10 day of March, 2021, at 12:15 o'clock P.M. Executed at
3890 W. Northwest Hwy #300, within the County of Dallas TX, at 11:19 o'clock A.M. on the
11 day of March, 2021, by delivering to the within named

Lauren Wright w/ risk management

Each in person, a true copy of this Citation together with the accompanying copy of this pleading, having first endorsed on same date of delivery.

The distance actually traveled by me in serving such process was _____ miles and my fees are as follows: To certify which witness my hand

For serving Citation \$ 80.00

For mileage \$ _____

For Notary \$ _____

of _____ County,

by Ben Adamcik 3193 Deputy

(Must be verified if served outside the State of Texas.)

BEN ADAMCIK
CONSTABLE PCT. 3,
DALLAS COUNTY

Signed and sworn to by the said _____ before me this _____ day of _____, 20 _____,

To certify which witness my hand and seal of office.

Notary Public _____ County _____



2021 MAR 10 PM 12:15
DALLAS COUNTY
CONSTABLE PCT. 3

03/11
11:19 AM
Lauren Wright
risk management

EXHIBIT A-4

**FORM NO. 353-3 - CITATION
THE STATE OF TEXAS**

**To: CENTRAL MARKET- HEB
646 SOUTH FLOREST
SAN ANTONIO TX 78204**

FILED
21 MAR 23 AM 8:25

FELICIA PITRE
DISTRICT CLERK
DALLAS COUNTY, TEXAS
Carlenia Bouligny

GREETINGS:

You have been sued. You may employ an attorney. If you or your attorney do not file a written Answer with the clerk who issued this citation by 10 o'clock a.m. of the Monday next following the expiration of twenty days after you were served this citation and **petition**, a default judgment may be taken against you. In addition to filing a written answer with the clerk, you may be required to make initial disclosures to the other parties of this suit. These disclosures generally must be made no later than 30 days after you file your answer with the clerk. Find out more at TexasLawHelp.org. Your answer should be addressed to the clerk of the **95th District Court** at 600 Commerce Street, Ste. 101, Dallas, Texas 75202.

Said Plaintiff being **HANANE CEDDADI SAF**


Filed in said Court **9th day of November, 2020** against

CENTRAL MARKET- HEB

For Suit, said suit being numbered **DC-20-16679**, the nature of which demand is as follows:
Suit on **EMPLOYMENT** etc. as shown on said petition, a copy of which accompanies this citation. If this citation is not served, it shall be returned unexecuted.

WITNESS: FELICIA PITRE, Clerk of the District Courts of Dallas, County Texas.
Given under my hand and the Seal of said Court at office this 15th day of March, 2021.

ATTEST: FELICIA PITRE, Clerk of the District Courts of Dallas, County, Texas

By *Carlenia Bouligny*
CARLENIA BOULIGNY


CERT MAIL

CITATION

DC-20-16679

**HANANE CEDDADI SAF
Vs.
CENTRAL MARKET- HEB**

**ISSUED THIS
15th day of March, 2021**

**FELICIA PITRE
Clerk District Courts,
Dallas County, Texas**

By: CARLENIA BOULIGNY, Deputy

**Attorney for Plaintiff
HANANE CEDDADI SAF
7344 HIGHLAND HEATHER LN
DALLAS TX 75248**

cheddadi.hanane@gmail.com

DALLAS COUNTY CONSTABLE
FEE PAID **FEE NOT PAID**

OFFICER'S RETURN

Case No. : DC-20-16679

Court No. 95th District Court

Style: HANANE CEDDADI SAF

Vs.

CENTRAL MARKET- HEB

Came to hand on the 15th day of March, 20 21, at 9:37 o'clock A.M. Executed at _____,
within the County of _____ at _____ o'clock _____ .M. on the _____ day of _____,
20 _____, by delivering to the within named _____

Each in person, a true copy of this Citation together with the accompanying copy of this pleading, having first endorsed on same date of delivery. The distance actually traveled by me in serving such process was _____ miles and my fees are as follows: To certify which witness my hand.

For serving Citation	\$ _____	_____
For mileage	\$ _____	of _____ County, _____
For Notary	\$ _____	by _____ Deputy

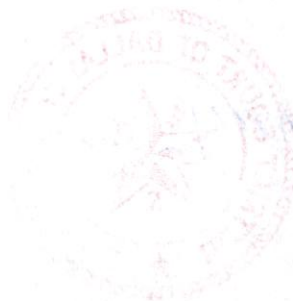
(Must be verified if served outside the State of Texas.)

Signed and sworn to by the said _____ before me this _____ day of _____, 20 _____,

To certify which witness my hand and seal of office.

Notary Public _____ County _____

DALLAS COUNTY CONSTABLE
FEES NOT
PAID



OFFICER'S RETURN

Case No. : DC-20-16679

Court No.95th District Court

Style: HANANE CEDDADI SAF

Vs.

CENTRAL MARKET- HEB

Came to hand on the **15TH** day of **MARCH, 2021** at **9:37** o'clock **A.M.** Executed at **646 SOUTH FLOREST, SAN ANTONIO, TX 78204** within the County of

_____ at **7:53** o'clock **A.M.** on the **18TH** day of **MARCH, 2021**, by delivering to the within named **CENTRAL MARKET-HEB BY US CERTIFIE**
MAIL RETURN RECEIPT RECEIVED AND SIGNED BY JAMES WN.

Each in person, a true copy of this Citation together with the accompanying copy of this pleading, having first endorsed on same date of delivery. The distance actually traveled by me in serving such process was _____ miles and my fees are as follows: To certify which witness my hand.

	For serving Citation	\$ 76.00	JAMES WN.
For mileage	\$ _____	of _____	County, _____
For Notary	\$ _____	by <i>Felicia Pitre</i>	Deputy

(Must be verified if served outside the State of Texas.)

FELICIA PITRE
DISTRICT CLERK
600 COMMERCE STREET
DALLAS, TEXAS 75202-4606

Signed and sworn to by the said _____ before me this _____ day of _____, 20 _____,

To certify which witness my hand and seal of office.

Notary Public _____ County _____

Reference ID: 92148901066154000160784495
DC 20-16679 - CBOULIGNY - 03/15/2021
CENTRAL MARKET-HEB
646 SOUTH FLOREST
SAN ANTONIO, TX 78204-0000

EXHIBIT A-5

CAUSE NO. DC-20-16679

HANANE CHEDDADI SAFI,	§	IN THE DISTRICT COURT
	§	
Plaintiff,	§	
	§	
v.	§	95TH JUDICIAL DISTRICT
	§	
CENTRAL MARKET - HEB,	§	
	§	
Defendant.	§	DALLAS COUNTY, TEXAS

DEFENDANT’S ORIGINAL ANSWER TO PLAINTIFF’S ORIGINAL POSITION

Defendant HEB Grocery Company, L.P. (“HEB”), incorrectly named as Central Market – HEB, files this its Original Answer to Plaintiff Hanane Cheddadi Safi’s (“Safi”) Original Position (“Petition”), and states:

I. GENERAL DENIAL

Pursuant to Rule 92 of the Texas Rules of Civil Procedure, HEB denies each and every allegation in the Petition and any amendment or supplement thereto, and demands strict proof thereof as required by the laws of the State of Texas. With respect to any claim by Safi for punitive damages, HEB demands strict proof thereof by clear and convincing evidence.

II. PRAYER FOR RELIEF

HEB requests the following relief:

- (a) that Safi take nothing by way of her Petition;
 - (b) that HEB be awarded its costs and reasonable attorneys’ fees incurred in defense of this action pursuant to Chapter 37 of the Texas Civil Practice and Remedies Code;
- and

- (c) that HEB be awarded all such other and further relief at law or in equity to which it may show itself to be justly entitled.

Respectfully submitted,

By: /s/ Jana S. Baker

JANA S. BAKER

Texas State Bar No. 00794610

jana.baker@ogletree.com

LAURA E. GRUBB

Texas State Bar No. 24097774

laura.sandman@ogletree.com

**OGLETREE, DEAKINS, NASH, SMOAK &
STEWART, P.C.**

500 Preston Commons West

8117 Preston Road

Dallas, Texas 75225

214.987.3800 (Phone)

214.987.3927 (Fax)

**ATTORNEYS FOR DEFENDANT HEB
GROCERY COMPANY, L.P.**

CERTIFICATE OF SERVICE

I hereby certify that on April 9, 2021, the foregoing document was electronically filed with the Clerk of the Court using the CM/ECF system, which will transmit a Notice of Electronic Filing to Plaintiff, and sent a copy of the foregoing document via electronic mail to:

Hanane Cheddadi Safi
7344 Highland Heather Ln
Dallas, TX 75248
Cheddadi.hanane@gmail.com

PRO SE PLAINTIFF

/s/ Jana S. Baker

JANA S. BAKER

46720094.2

Automated Certificate of eService

This automated certificate of service was created by the eFiling system. The filer served this document via email generated by the eFiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Jana Baker on behalf of Jana Baker
Bar No. 00794610
jana.baker@ogletreedeakins.com
Envelope ID: 52329431
Status as of 4/12/2021 9:03 AM CST

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Jana Baker		jana.baker@ogletreedeakins.com	4/9/2021 4:54:55 PM	SENT
Amy Barbosa		amy.barbosa@ogletree.com	4/9/2021 4:54:55 PM	SENT
Laura GrubbSandman		laura.sandman@ogletree.com	4/9/2021 4:54:55 PM	SENT
Lori DeMoss		lori.demoss@ogletree.com	4/9/2021 4:54:55 PM	SENT
Dallas Docketing		DALDocketing@ogletree.com	4/9/2021 4:54:55 PM	SENT